

DOAR RIECK KALEY & MACK

ATTORNEYS AT LAW

JOHN DOAR (1921-2014)

JOHN F. KALEY

WALTER MACK

OF COUNSEL

JOHN JACOB RIECK, JR.

JAMES I. WASSERMAN

DAVID RIVERA

MICHAEL MINNEFOR

ASTOR BUILDING

7TH FLOOR

217 BROADWAY

NEW YORK, N.Y. 10007-2911

TELEPHONE: (212) 619-3730

FACSIMILE: (212) 962-5037

e-mail: firm@doarlaw.com

website: www.doarlaw.com

February 13, 2018

By ECF

The Honorable Kimba M. Wood
United States District Court
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, New York 10007

**Re: United States v. Steven Brown, 16 Cr. 436 (KMW)
Letter Application Seeking The Court's Permission
For Defendant Steven Brown To Apply For A New Passport**

Dear Judge Wood:

This firm represents the defendant, Steven Brown. As you are aware, Mr. Brown previously requested the Court's permission to attend The Berlin Film Festival between February 12 and February 17, 2018. That request was granted. (ECF Doc. No. 146).

However, Mr. Brown's passport is due to expire in three weeks, and travel to Germany is not permitted unless he obtains a renewed passport. When he applied to renew the passport, the Department of State placed a stop-notice on his application because of his status as a defendant in this matter.

After consulting with the Government and the Pretrial Services Officer, Matthew Carter, we have been informed that the Department of State requires that Mr. Brown obtain permission from Your Honor to make the passport renewal application before the stop-notice can be lifted. (As of now, he only has permission to travel, not to renew his passport.)

Accordingly, for the reasons set forth above, we respectfully request that the Court permit Mr. Brown to renew his passport. The Government takes no position on this request.

We thank the Court for its attention to this matter.

Respectfully submitted,



Walter Mack

Enclosures

cc: Katherine C. Reilly
Noah Solowiejczyk
Assistant United States Attorneys